

THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI

BRITTANY POLLARD, INDIVIDUALLY;  
SAMUEL POLLARD, JR., INDIVIDUALLY;  
AND BRITTANY POLLARD AND SAMUEL POLLARD, JR.  
ON BEHALF OF ALL WRONGFUL DEATH BENEFICIARIES  
OF CHLOE LEIGH POLLARD, DECEASED

PLAINTIFFS

VS.

CAUSE NO. 20-351

EDITH SMITH-RAYFORD, M.D.; SAMUEL BROWN, M.D.;  
JACKSON HMA, LLC A/K/A MERIT HEALTH CENTRAL D/B/A  
CENTRAL MISSISSIPPI MEDICAL CENTER  
AND JOHN DOES 1-10

DEFENDANTS

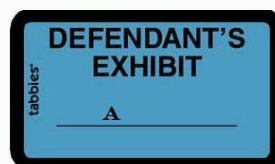
**COMPLAINT**  
**(JURY TRIAL DEMANDED)**

COME NOW Plaintiffs, Brittany Pollard and Samuel Pollard, Jr., Individually and on behalf of all wrongful death beneficiaries of Chloe Leigh Pollard, by and through counsel, and files this, Complaint against the Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center, as follows, to-wit:

**PARTIES**

1. Plaintiffs, Brittany Pollard and Samuel Pollard, Jr., are bonafide adult residents of Hinds County, Mississippi. Plaintiffs are the natural parents, heirs-at-law and wrongful death beneficiaries of decedent Chloe Leigh Pollard.

2. Defendant, Edith Smith-Rayford, M.D., is an adult resident citizen of Hinds County, Mississippi, who may be served with the process of this Court at her place of employment 5429 Robinson Road Ext. Jackson, Mississippi 39204. At all times material hereto, Defendant, Edith Smith-Rayford, M.D., was the agent, servant, employee, staff physician and/or resident physician of Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center



(hereinafter “Jackson HMA, LLC”) and acting within the course and scope of her employment with Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center (hereinafter “Jackson HMA, LLC”).

3. Defendant, Samuel Brown, M.D., is an adult resident citizen of Hinds County, Mississippi, who may be served with the process of this Court at his place of employment, 1860 Chadwick Drive Ste. 300, Jackson, MS 39204. At all times material hereto, Defendant, Samuel Brown, M.D., was the agent, servant, employee, staff physician and/or resident physician of Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center (hereinafter “Jackson HMA, LLC”) and acting within the course and scope of his employment with Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center (hereinafter “Jackson HMA, LLC”).

4. Defendant, Jackson HMA, LLC, a/k/a Merit Health Central d/b/a Central Mississippi Medical Center (hereinafter “Jackson HMA, LLC”), is an entity incorporated under the laws of Mississippi and operating in the State of Mississippi through its physicians, staff, agents, servants, employees and representatives, in Hinds County, Mississippi, and which may be served with the process of this court by serving its registered agent, CSC of Rankin County, Inc., Mirror Lake Plaza, 2829 Lakeland Drive Suite 1502 Flowood, MS 39232.

5. Defendants, John Does 1 through 10, are unknown Defendants who are parties herein pursuant to Rule 9(h) of the Mississippi Rules of Civil Procedure. The exact identity of John Does 1 through 10 is unknown to the Plaintiff at the present time. Said fictitious parties shall be identified as party Defendants upon the discovery of the identities thereof.

6. At all times alleged herein, Jackson HMA, LLC, a/k/a Merit Health Central d/b/a

Central Mississippi Medical Center (hereinafter “Jackson HMA, LLC”), held itself out to the general public and to Plaintiffs, in particular, as a highly qualified hospital staffed by highly trained medical experts, including, but not limited to, physicians, certified nurse practitioners, licensed nurses and other skilled medical personnel, and the Defendant was actively engaged in such medical care and practice in Jackson, Mississippi.

7. At all times alleged herein, Edith Smith-Rayford, M.D., held herself out to the general public and to Plaintiffs, in particular, as a competent, licensed physician, capable of providing a high degree of skill, care and knowledge, and the Defendant was actively engaged in such medical care and practice in Jackson, Mississippi.

8. At all times alleged herein, Samuel Brown, M.D., held himself out to the general public and to Plaintiffs, in particular, as a competent, licensed physician, capable of providing a high degree of skill, care and knowledge, and the Defendant was actively engaged in such medical care and practice in Jackson, Mississippi.

#### **JURISDICTION AND VENUE**

9. Plaintiffs would show that this Court is vested with both subject matter and in personam jurisdiction and venue is proper in this Court.

#### **INTRODUCTION**

10. This civil action is brought pursuant to §11-7-13, Miss. Code Ann., as amended, commonly known as the “Wrongful Death” statute. Chloe Leigh Pollard died in Hinds County, Mississippi, on April 13, 2018, as a result of the negligence of the Defendants named herein. This civil action is brought for the benefit of all of the heirs-at-law of Chloe Leigh Pollard and the Estate of Chloe Leigh Pollard, Deceased.



11. Pursuant to the provisions of §11-7-13, Miss. Code Ann., as amended, Chloe Leigh Pollard suffered compensable damages in the form of physical pain and suffering, mental anguish, medical expenses and funeral expenses for which she would have been entitled to recover had she survived said medical treatment.

12. Pursuant to the provisions of §11-7-13, Miss. Code Ann., as amended, Brittany Pollard and Samuel Pollard, Jr. and the heirs-at-law of Chloe Leigh Pollard, Deceased, seek compensatory and punitive damages against Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center and John Does 1 through 10 based upon the theory of medical negligence.

### **BACKGROUND**

13. In August, 2017, Dr. Edith Smith-Rayford undertook the medical care and treatment of Brittany Pollard at Central Mississippi Health Services, Inc. for the purpose of pre-natal care and delivery of her infant child. During the course of said care and treatment, Dr. Edith Smith-Rayford saw Mrs. Pollard for pre-natal care and was to ultimately deliver of her unborn child. Given Dr. Smith-Rayford's past medical treatment of Brittany Pollard, including but not limited to pre-natal care and delivery of each of Mrs. Pollard's other children, Dr. Smith-Rayford knew or should have known that Mrs. Pollard experienced early births. Therefore, Defendant Smith-Rayford should have ensured that in her absence that an attending physician was available should Mrs. Pollard experience early delivery. Given the history with this patient, Dr. Smith-Rayford failed to keep the appointment scheduled for 4/12/2018 or in the alternative have another physician see Mrs. Pollard to perform the scheduled ultrasound on 4/12/2018. By not seeing Ms. Pollard on 4/12/2018, Dr. Smith-Rayford an ultrasound was never performed to ensure that the unborn infant was not in any type of fetal distress.

Had the ultrasound been performed, it would have been clear that Mrs. Pollard was indeed in labor and that the unborn infant was in fetal distress thereby requiring emergency measures to be taken to ensure the safety of both the mother and the unborn infant. By failing to do so, Dr. Smith-Rayford negligently failed to properly recognize the patient's need for hospitalization and diagnostic testing to ensure the safety of the unborn infant and the patient. Dr. Smith-Rayford failed to recognize that Mrs. Pollard was suffering obvious signs of early/premature birth thereby resulting in the early/premature birth and ultimately the death of Chloe Leigh Pollard.

14. On April 13, 2018, Brittany Pollard presented to the Emergency Room at Merit Health Central around 9:15 a.m. complaining of severe pain. Ms. Pollard was held in triage and thereafter ultimately informed that she was in labor. By this time the pain had become so severe that Ms. Pollard requested that she be given an epidural. An epidural was never administered. The nursing staff made numerous attempts to notify the on-call physician Dr. Samuel Brown and/or Dr. Smith-Rayford who was supposed to be within 30 minutes from the hospital at any given time. During the following 3 hours, the nursing staff also attempted to locate the unborn infant's heart beat by use of a fetal heart monitor. Ms. Pollard's pain had worsened to the point that she suffered a spike in her blood pressure which further put to the unborn infant in fetal distress. By the time that the on-call physician, Dr. Samuel Brown, arrived at the hospital Ms. Pollard, along with assistance from Samuel Pollard, had delivered their infant.

**COUNT ONE**  
**MEDICAL MALPRACTICE**

15. Plaintiffs adopt and reallege the above and foregoing allegations set forth in paragraphs 1 through 14 of this Complaint and incorporates the same by reference as if fully set forth

herein.

16. In attempting to treat Brittany Pollard, Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center, committed multiple errors amounting to negligence such as would constitute unreasonable and unacceptable medical practice at the time and place of said diagnosis and treatment. Defendants Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center were negligent in the following manner:

a. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., were negligent in failing to exercise the degree of skill and care, or failing to possess the knowledge or skill ordinarily exercised or possessed by physicians and medical personnel engaged in a similar type of practice in this geographical area;

b. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., were negligent in failing to properly monitor the medical condition of Brittany Pollard and her unborn fetus, specifically, the heart rate and other vital statistics of the unborn fetus;

c. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., were negligent in failing to take immediate action to prevent or adequately treat the existing serious and life threatening medical conditions of the unborn fetus;

d. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., were negligent in failing to surgically intervene by carrying out a cesarean section delivery upon the infant's first entering into severe fetal distress;

e. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., negligently and recklessly failed to adequately investigate the cause of the unborn fetus' life threatening condition; and,

f. Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D., caused unreasonable and substantial delays in providing proper treatment to Brittany Pollard and her unborn fetus.

g. The infant's death was concurrently caused by failing to realize that: Brittany



Pollard was in pre-term labor thereby causing the unborn infant to enter into fetal distress; by failing to properly monitor the medical condition of the unborn fetus; failing to take immediate action to treat the obvious life threatening medical conditions of the unborn fetus; failing to prescribe the proper medications in an attempt to stop the labor contractions; and, by failing to perform an emergency cesarean section delivery upon the onset of the infant's first signs of severe fetal distress.

17. In committing the multiple acts and omissions complained of above, Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; and, Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center, grossly, willfully and recklessly deviated from the applicable standard of medical care and, by reason thereof, Plaintiffs should be awarded punitive damages so as to deter such conduct by others in the future.

18. As a direct and proximate result of the simple and gross negligence of Defendants, Edith Smith-Rayford, M.D.; and, Samuel Brown, M.D. as complained of above, Brittany Pollard, Samuel Pollard, Jr., the heirs-at-law of Chloe Leigh Pollard, Deceased, and the Estate of Chloe Leigh Pollard, Deceased, have suffered damages as enumerated below:

- a. Plaintiffs suffered physical and psychological injuries;
- b. Chloe Leigh Pollard suffered death;
- c. Chloe Leigh Pollard suffered physical and psychological injuries;
- d. Chloe Leigh Pollard and her heirs-at-law have suffered medical and funeral expenses;
- e. Chloe Leigh Pollard and her heirs-at-law have suffered a loss of enjoyment of life;
- f. Plaintiffs and the heirs-at-law of Chloe Leigh Pollard, Deceased, have suffered the loss of the net cash value of Chloe Leigh Pollard's life; and,
- g. Plaintiffs and the heirs-at-law of Chloe Leigh Pollard, Deceased, have suffered the loss of the love, companionship, society and association of Chloe Leigh Pollard, Deceased.

**COUNT TWO**

**NEGLIGENCE OF AND, JACKSON HMA, LLC A/K/A MERIT HEALTH CENTRAL  
D/B/A CENTRAL MISSISSIPPI MEDICAL CENTER**

19. Plaintiffs adopt and reallege the above and foregoing allegations set forth in paragraphs 1 through 18 of this Complaint and incorporates the same by reference as if fully set forth herein.

20. In attempting to treat Brittany Pollard and in attempting to perform the delivery of her unborn fetus, Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center, committed multiple errors amounting to negligence such as would constitute unreasonable and unacceptable medical practice at the time and place of said diagnosis and treatment. Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center was negligent in the following manner:

a. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to furnish properly trained and qualified physicians, nurses, medical technicians and other skilled medical personnel to attend Brittany Pollard and her unborn fetus;

b. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center negligently and recklessly failed to perform an adequate physical examination and appropriate diagnostic testing of Brittany Pollard;

c. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center negligently and recklessly failed to take immediate action to prevent or adequately treat the existing serious and life threatening medical conditions of the unborn fetus;

d. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to notify the patient's surgeon of the patient's and the unborn fetus' life threatening condition;

e. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to administer the proper medication to attempt to stop the pre-term labor;



f. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center negligently and recklessly failed to adequately investigate the cause of the pre-term labor;

g. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center negligently and recklessly failed to adequately investigate the cause of the unborn fetus' life threatening condition;

h. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to surgically intervene by carrying out a cesarean section delivery upon the fetus' first entering into severe fetal distress;

i. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center failed to notify the patient's surgeon of the patient's and the unborn fetus' life threatening condition; and,

j. Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center caused unreasonable and substantial delays in providing proper treatment to Brittany Pollard and the unborn fetus.

k. The infant's death was concurrently caused by the failure to properly diagnose Brittany Pollard's pre-term labor contractions; monitor the medical condition of the unborn fetus, failure to take immediate action to treat the obvious life threatening medical conditions of the unborn fetus, and the failure to perform an emergency cesarean section delivery upon the onset of the infant's first signs of severe fetal distress.

21. In committing the multiple acts and omissions complained of above, Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center grossly, willfully and recklessly deviated from the applicable standard of medical care and, by reason thereof, Plaintiffs should be awarded punitive damages so as to deter such conduct by others in the future.

22. As a direct and proximate result of the simple and gross negligence of Defendant Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center as complained of above, Brittany Pollard, the heirs-at-law of Chloe Leigh Pollard, Deceased, and the

Estate of Chloe Leigh Pollard, Deceased, have suffered damages as enumerated below:

- a. Plaintiffs suffered physical and psychological injuries;
- b. Chloe Leigh Pollard suffered death;
- c. Chloe Leigh Pollard suffered physical and psychological injuries;
- d. Chloe Leigh Pollard and her heirs-at-law have suffered medical and funeral expenses;
- e. Chloe Leigh Pollard and her heirs-at-law have suffered a loss of enjoyment of life;
- f. Plaintiffs and the heirs-at-law of Chloe Leigh Pollard, Deceased, have suffered the loss of the net cash value of Chloe Leigh Pollard's life; and,
- g. Plaintiffs and the heirs-at-law of Chloe Leigh Pollard, Deceased, have suffered the loss of the love, companionship, society and association of Chloe Leigh Pollard, Deceased.

WHEREFORE, PREMISES CONSIDERED, Brittany Pollard, Samuel Pollard, Jr., the heirs-at-law of Chloe Leigh Pollard, Deceased, and the Estate of Chloe Leigh Pollard, Deceased, sue and demand judgment for actual and punitive damages sufficient to fairly compensate them for the injuries caused by Defendants, Edith Smith-Rayford, M.D.; Samuel Brown, M.D.; and, Jackson HMA, LLC a/k/a Merit Health Central d/b/a Central Mississippi Medical Center and John Does 1 through 10, within the subject matter jurisdiction of this Court together with pre-judgment interest, post-judgment interest and all costs herein.

Respectfully submitted,

BRITTANY POLLARD, SURVIVING  
MOTHER OF CHLOE LEIGH POLLARD,  
DECEASED

BY: Brittany Pollard 1001-308  
BRITTANY POLLARD, PRO SE

Respectfully submitted,  
SAMUEL POLLARD, SURVIVING  
FATHER OF CHLOE LEIGH POLLARD,  
DECEASED

BY:

  
\_\_\_\_\_  
SAMUEL POLLARD, PRO SE

UCC1-360



COVER SHEET Civil Case Filing Form (To be completed by Attorney/Party Prior to Filing of Pleading)		Court Identification Docket #		Case Year	Docket Number
		25	11	06	351
		County #	Judicial District	Court ID (CH, CI, CO)	Local Docket ID
		06	11	06	
		Month	Date	Year	
Mississippi Supreme Court Administrative Office of Courts Form AOC/01 (Rev 2015)		This area to be completed by clerk			Case Number if filed prior to 1/1/94
In the <u>Circuit</u> Court of <u>Hinds</u> County - <u>FIRST</u> Judicial District					
Origin of Suit (Place an "X" in one box only)					
<input checked="" type="checkbox"/> Initial Filing		<input type="checkbox"/> Foreign Judgment Enrolled			
<input type="checkbox"/> Remanded		<input type="checkbox"/> Joining Suit/Action			
<input type="checkbox"/> Reinstated		<input type="checkbox"/> Transfer from Other court			
<input type="checkbox"/> Reopened		<input type="checkbox"/> Appeal			
Plaintiff - Party Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form					
Individual <u>POHARD</u> <u>BRITANY</u> Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV					
Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____					
Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____					
Business _____					
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated					
Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____					
D/B/A _____					
Address of Plaintiff <u>322 North Pearl Street, Jackson, MS 39209</u>					
Attorney (Name & Address) <u>James H. Harty, P.O. Box 1300, Gethsemane, MS 39304</u> MS Bar No. <u>000223</u>					
Check (x) if Individual Filing Initial Pleading is NOT an attorney					
Signature of Individual Filing: <u>X</u> <u>Britany Pohard</u> <u>UCC1-203</u>					
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form					
Individual <u>Smith - RAYford</u> <u>Edith</u> Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV					
Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____					
Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____					
D/B/A or Agency _____					
Business _____					
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated					
Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: _____					
D/B/A _____					
Attorney (Name & Address) - If Known _____ MS Bar No. _____					
Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet					
Nature of Suit (Place an "X" in one box only)					
Domestic Relations		Business/Commercial		Children/Minors - Non-Domestic	
<input type="checkbox"/> Child Custody/Visitation		<input type="checkbox"/> Accounting (Business)		<input type="checkbox"/> Adoption - Contested	
<input type="checkbox"/> Child Support		<input type="checkbox"/> Business Dissolution		<input type="checkbox"/> Adoption - Uncontested	
<input type="checkbox"/> Contempt		<input type="checkbox"/> Debt Collection		<input type="checkbox"/> Consent to Abortion	
<input type="checkbox"/> Divorce/Fault		<input type="checkbox"/> Employment		<input type="checkbox"/> Minor Removal of Minority	
<input type="checkbox"/> Divorce: Irreconcilable Diff.		<input type="checkbox"/> Foreign Judgment		<input type="checkbox"/> Other	
<input type="checkbox"/> Domestic Abuse		<input type="checkbox"/> Garnishment		Civil Rights	
<input type="checkbox"/> Emancipation		<input type="checkbox"/> Replevin		<input type="checkbox"/> Elections	
<input type="checkbox"/> Modification		<input type="checkbox"/> Other		<input type="checkbox"/> Expungement	
<input type="checkbox"/> Paternity		Probate		<input type="checkbox"/> Habeas Corpus	
<input type="checkbox"/> Property Division		<input type="checkbox"/> Accounting (Probate)		<input type="checkbox"/> Post Conviction Relief/Prisoner	
<input type="checkbox"/> Separate Maintenance		<input type="checkbox"/> Birth Certificate Correction		<input type="checkbox"/> Other	
<input type="checkbox"/> Term. of Parental Rights-Chancery		<input type="checkbox"/> Mental Health Commitment		Contract	
<input type="checkbox"/> UPPSA (eff 7/1/97; formerly URESA)		<input type="checkbox"/> Conservatorship		<input type="checkbox"/> Breach of Contract	
<input type="checkbox"/> Other		<input type="checkbox"/> Guardianship		<input type="checkbox"/> Installment Contract	
Appeals		<input type="checkbox"/> Heirship		<input type="checkbox"/> Insurance	
<input type="checkbox"/> Administrative Agency		<input type="checkbox"/> Intestate Estate		<input type="checkbox"/> Specific Performance	
<input type="checkbox"/> County Court		<input type="checkbox"/> Minor's Settlement		<input type="checkbox"/> Other	
<input type="checkbox"/> Hardship Petition (Driver License)		<input type="checkbox"/> Muniment of Title		Statutes/Rules	
<input type="checkbox"/> Justice Court		<input type="checkbox"/> Name Change		<input type="checkbox"/> Bond Validation	
<input type="checkbox"/> MS Dept Employment Security		<input type="checkbox"/> Testate Estate		<input type="checkbox"/> Civil Forfeiture	
<input type="checkbox"/> Municipal Court		<input type="checkbox"/> Will Contest		<input type="checkbox"/> Declaratory Judgment	
<input type="checkbox"/> Other		<input type="checkbox"/> Alcohol/Drug Commitment (pre-arrest)		<input type="checkbox"/> Injunction or Restraining Order	
				<input type="checkbox"/> Other	
				Real Property	
				<input type="checkbox"/> Adverse Possession	
				<input type="checkbox"/> Ejectment	
				<input type="checkbox"/> Eminent Domain	
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				<input type="checkbox"/> Judicial Foreclosure	
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				<input type="checkbox"/> Partition	
				<input type="checkbox"/> Tax Sale: Confirm/Cancel	
				<input type="checkbox"/> Title Boundary or Easement	
				<input type="checkbox"/> Other	
				Torts	
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				<input type="checkbox"/> Fraud	
				<input type="checkbox"/> Intentional Tort	
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				<input type="checkbox"/> Malpractice - Legal	
				<input type="checkbox"/> Malpractice - Medical	
				<input type="checkbox"/> Mass Tort	
				<input type="checkbox"/> Negligence - General	
				<input type="checkbox"/> Negligence - Motor Vehicle	
				<input type="checkbox"/> Product Liability	
				<input type="checkbox"/> Subrogation	
				<input checked="" type="checkbox"/> Wrongful Death	
				<input type="checkbox"/> Other	

IN THE Circuit COURT OF Hinds COUNTY, MISSISSIPPI  
First JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_  
 File Yr \_\_\_\_\_ Chronological No. \_\_\_\_\_ Clerk's Local ID \_\_\_\_\_

Docket No. If Filed  
 Prior to 1/1/94 \_\_\_\_\_

**PLAINTIFFS IN REFERENCED CAUSE - Page 1 of \_\_\_\_\_ Plaintiff Pages  
 IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

**Plaintiff #2:**

Individual: Pollard Samuel ( \_\_\_\_\_ ) TR  
Last Name First Name Maiden Name, if Applicable Middle Init. JWS/MLV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Plaintiff #3:**

Individual: \_\_\_\_\_ ( \_\_\_\_\_ ) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. JWS/MLV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Plaintiff #4:**

Individual: \_\_\_\_\_ ( \_\_\_\_\_ ) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. JWS/MLV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_



IN THE Circuit COURT OF Hinds COUNTY, MISSISSIPPI  
First JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_  
 File Yr \_\_\_\_\_ Chronological No. \_\_\_\_\_ Clerk's Local ID \_\_\_\_\_

Docket No. If Filed  
 Prior to 1/1/94 \_\_\_\_\_

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of \_\_\_\_\_ Defendants Pages**  
**IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

**Defendant #2:**

Individual: Brown Samuel ( \_\_\_\_\_ ) M, D  
Last Name First Name Maiden Name, if Applicable Middle Init. JUDGE/AV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Defendant #3:**

Individual: \_\_\_\_\_ ( \_\_\_\_\_ ) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. JUDGE/AV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

✓ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A JACKSON HMA, LLC / QMMC

Business JACKSON HMA LLC  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Defendant #4:**

Individual: John Doe 1-10 ( \_\_\_\_\_ ) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. JUDGE/AV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_



IN THE Circuit COURT OF Hinds COUNTY, MISSISSIPPI  
First JUDICIAL DISTRICT, CITY OF

Docket No. \_\_\_\_\_ File Yr \_\_\_\_\_ Chronological No. \_\_\_\_\_ Clerk's Local ID \_\_\_\_\_  
 Docket No. If Filed Prior to 1/1/94 \_\_\_\_\_

**DEFENDANTS IN REFERENCED CAUSE - Page \_\_\_ of \_\_\_ Defendants Pages  
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant # \_\_\_:

Individual: \_\_\_\_\_  
 Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business John Does 1-10  
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_

Defendant # \_\_\_:

Individual: \_\_\_\_\_  
 Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_

Defendant # \_\_\_:

Individual: \_\_\_\_\_  
 Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_

THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI

BRITTANY POLLARD, INDIVIDUALLY;  
SAMUEL POLLARD, JR., INDIVIDUALLY;  
AND BRITTANY POLLARD AND SAMUEL POLLARD, JR.  
ON BEHALF OF ALL WRONGFUL DEATH BENEFICIARIES  
OF CHLOE LEIGH POLLARD, DECEASED

PLAINTIFFS

VS.

CAUSE NO.

20-351

EDITH SMITH-RAYFORD, M.D.; SAMUEL BROWN, M.D.;  
JACKSON HMA, LLC A/K/A MERIT HEALTH CENTRAL D/B/A  
CENTRAL MISSISSIPPI MEDICAL CENTER  
AND JOHN DOES 1-10

DEFENDANTS

**SUMMONS**

TO ANY LAWFUL OFFICER AUTHORIZED TO SERVE PROCESS:  
YOU ARE HEREBY COMMANDED TO SUMMON:

Samuel Brown, M.D.  
1860 Chadwick Drive Ste. 300  
Jackson, MS 39204

**NOTICE TO DEFENDANT**

THE PETITION WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST  
TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS  
PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Plaintiffs  
Brittany Pollard and Samuel Pollard, Jr., whose post office address is 322 North Prentiss Street, Jackson,  
MS 39209. Your response must be mailed or delivered within thirty (30) days from the date of delivery  
of this Summons and Complaint or a judgment by default will be entered against you for the money or  
other things demanded in the Petition.

You must also file the original of your response with the Clerk of this Court within a reasonable time  
afterward.

Issued under my hand and the seal of said Court, this the 11 day of June, 2020.

Zack Wallace, Chancery Clerk  
Hinds County, Mississippi

BY: M. Green DC.





THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI

BRITTANY POLLARD, INDIVIDUALLY;  
SAMUEL POLLARD, JR., INDIVIDUALLY;  
AND BRITTANY POLLARD AND SAMUEL POLLARD, JR.  
ON BEHALF OF ALL WRONGFUL DEATH BENEFICIARIES  
OF CHLOE LEIGH POLLARD, DECEASED

PLAINTIFFS

VS.

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20-351

EDITH SMITH-RAYFORD, M.D.; SAMUEL BROWN, M.D.;  
JACKSON HMA, LLC A/K/A MERIT HEALTH CENTRAL D/B/A  
CENTRAL MISSISSIPPI MEDICAL CENTER  
AND JOHN DOES 1-10

DEFENDANTS

**S U M M O N S**

TO ANY LAWFUL OFFICER AUTHORIZED TO SERVE PROCESS:  
YOU ARE HEREBY COMMANDED TO SUMMON:

Edith Smith-Rayford, M.D.  
5429 Robinson Road Ext.  
Jackson, Mississippi 39204

**NOTICE TO DEFENDANT**

THE PETITION WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST  
TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS  
PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Plaintiffs  
Brittany Pollard and Samuel Pollard, Jr., whose post office address is 322 North Prentiss Street, Jackson,  
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other things demanded in the Petition.

You must also file the original of your response with the Clerk of this Court within a reasonable time  
afterward.

Issued under my hand and the seal of said Court, this the 11 day of June, 2020.



Zack Wallace, Chancery Clerk  
Hinds County, Mississippi

*[Signature]*